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*Via Electronic Filing*

Ms. Marlene H. Dortch  
Secretary  
Federal Communications Commission  
445 12<sup>th</sup> Street, S.W.  
Washington, DC 20554

*EX PARTE LETTER*

RE: Special Access Rates for Price Cap Local Exchange Carriers, WC Docket No. 05-25

Dear Secretary Dortch:

On June 13, 2012, BT met with Commissioner Clyburn's legal advisor Angela Kronenberg to discuss the pending pricing flexibility petitions and pricing flexibility triggers. Representing BT were Sheba Chacko, Senior Counsel and Head, North American Regulation and Global Telecoms Policy, and Jennifer Taylor Hodges, VP, US Government Affairs.

BT explained that there is ample evidence in the record showing that the pricing flexibility triggers are broken and urged the Commission to suspend the triggers and deny pending petitions for pricing flexibility while the Commission develops a new pricing flexibility framework. BT refuted ILEC claims that DS-1 and DS-3 access services are obsolete and made clear that its global Fortune 2000 customers rely on these inputs to connect their US sites to their global networks and are likely to do so for the foreseeable future.<sup>1</sup>

Sincerely,

A handwritten signature in black ink that reads "SChacko". The signature is stylized, with the first letter 'S' being large and the 'Chacko' part written in a cursive-like script.

Sheba Chacko  
Head, North American Regulation and Global Telecoms  
Policy, BT

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<sup>1</sup> The extent of BT's customers' reliance on DS-1 and DS-3 circuits and the reasons for customers' failure to migrate to Ethernet services was explained in the confidential version of BT's Reply Comments filed in this docket on Feb. 24, 2010. Not much has changed in two years.

cc: Angela Kronenberg